

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

POST OFFICE STRUCTURE PLAN

DOCKET NO. N2012-2

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-7 THROUGH 14]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

June 6, 2012

Respectfully submitted,

N20122C7

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-7 The Postal Service has filed a number of Library References in this Docket that contain large listings of various postal facilities in the format of an Excel spreadsheet. USPS-LR-N2012-2/1 has one spreadsheet and USPS-LR-N2012-2/2 has two spreadsheets. For each of these three spreadsheets please generically describe the order of how the entries are shown vertically in the different rows.

DBP/USPS-8 [a] Please provide insight on how the collection times at the blue collection boxes located at the post office will have their collection times affected by the changes proposed in this Docket.

[b] Please provide similar information for the collection time at blue collection boxes located at points away from the post office.

DBP/USPS-9 [a] Please provide insight into how the changes proposed in this Docket will affect the time of the dispatch from the post office to the processing center.

[b] Please provide information on how it will affect the ability of the post office to dispatch mail collected by city delivery/rural delivery/HCR delivery carriers from customers along their route to have it dispatched for processing at the processing center of the day of collection from the customer.

DBP/USPS-10 Please provide insight into how the changes proposed in this Docket will affect the times that a customer will have to pick-up mail from their post office box.

DBP/USPS-11 Please provide insight into how the changes proposed in this Docket will affect the times that a customer will have to pick-up accountable or oversized mail at the post office whether addressed to a post office box or to a carrier route operated out of that office.

DBP/USPS-12 Please provide insight into how the changes proposed in this Docket will affect the availability and times of retail service on Saturday.

DBP/USPS-13 Please provide insight into how the changes proposed in this Docket will affect the times that carriers providing delivery service at that office will leave the office to start their routes.

DBP/USPS-14 Please provide an estimate of the cost of providing service at all of the offices affected by the changes being proposed in this Docket broken down in the following categories as well as providing information on how these amounts were determined:

[a] Direct compensation of employees presently employed at these offices.

[b] Indirect compensation [such as benefits or retirement] of employees presently employed at these offices.

[c] Direct compensation of employees proposed to be employed at these offices after implementation of this Docket.

[d] Indirect compensation [such as benefits or retirement] of employees proposed to be employed at these offices after implementation of this Docket.

[e] Fixed costs [such as rent, utilities, transportation, non-employee expenses and communication] for the operation of these post offices both before and after the implementation of the Docket.